

Presentment Date: June 1, 2022

Objection Deadline: May 31, 2022 at 4:00 p.m. (AST)

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth.**

**SECOND NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING THE  
TWO HUNDRED NINETY-FIFTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE  
COMMONWEALTH OF PUERTO RICO TO NO LIABILITY AND INCORRECT  
DEBTOR BONDHOLDER CLAIMS (ECF NO. 15718)**

PLEASE TAKE NOTICE that, on May 24, 2022, the Commonwealth of Puerto Rico (the “Commonwealth,” or the “Debtor”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Commonwealth pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Economic Stability Act* (“PROMESA”),<sup>2</sup> hereby submits a *Notice of Presentment of Proposed Order Granting the Two Hundred Ninety-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to No Liability and Incorrect Debtor Bondholder Claims* (this “Notice”).

**PLEASE TAKE FURTHER NOTICE** that, on January 22, 2021, the Commonwealth, by and through the Oversight Board, filed the *Two Hundred Ninety-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to No Liability and Incorrect Debtor Bondholder Claims* [ECF No. 15718] (the “Two Hundred Ninety-Fifth Omnibus Objection”) to the proofs of claim listed on Exhibit A thereto.

**PLEASE TAKE FURTHER NOTICE** that the Two Hundred Ninety-Fifth Omnibus Objection was initially scheduled for hearing on March 10, 2021, and subsequently adjourned, pursuant to notices, to the January Claim Objection Hearing (as defined below).

**PLEASE TAKE FURTHER NOTICE** that any party against whom the Two Hundred Ninety-Fifth Omnibus Objection was served, or any other party to the Debtors’ Title III cases who objected to the relief sought therein, was required to file and serve a response to the Two Hundred Ninety-Fifth Omnibus Objection with the clerk’s office of the United States District Court for the District of Puerto Rico by 4:00 p.m. (Atlantic Time) on February 24, 2021 (the “Response Deadline”).

**PLEASE TAKE FURTHER NOTICE** that, as set forth in Exhibit C to the Two Hundred Ninety-Fifth Omnibus Objection, if no responses were filed by the Response Deadline, the Two Hundred Ninety-Fifth Omnibus Objection “will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3)

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

in the opinion of the court, the interest of justice requires otherwise.” Ex. C to Two Hundred Ninety-Fifth Omnibus Objection, ECF No. 15718-4, at 2.

**PLEASE TAKE FURTHER NOTICE** that, on March 5, 2021, the Commonwealth, by and through the Oversight Board, filed a notice of presentment in connection with the Two Hundred Ninety-Fifth Omnibus Objection [ECF No. 15962], and on May 5, 2021, the Court entered an order granting the Two Hundred Ninety-Fifth Omnibus Objection [ECF No. 16694] (the “Order”).

**PLEASE TAKE FURTHER NOTICE** that, after the Court issued the Order, the Commonwealth became aware of timely correspondence from the Claimant associated with Claim No. 167957 listed on Exhibit A hereto (the “Claim to Be Heard”).

**PLEASE TAKE FURTHER NOTICE** that, on December 8, 2021, this Court entered the *Order Regarding Adjourned Omnibus Objections to Claims* [ECF No. 19461] (the “Order Regarding Adjourned Omnibus Objections”), scheduling hearings on January 19-20, 2022, at 9:30 a.m. (Atlantic Time) (the “January Claim Objection Hearing”), and February 16-17, 2022, at 9:30 a.m. (Atlantic Time) (the “February Claim Objection Hearing,” and together with the January Claim Objection Hearing, the “Claim Objection Hearings”), to consider, *inter alia*, the Two Hundred Ninety-Fifth Omnibus Objection. Order Regarding Adjourned Omnibus Objections at 1.

**PLEASE TAKE FURTHER NOTICE** that, at the January Claim Objection Hearing, the Commonwealth prosecuted, and the Court sustained, the Two Hundred Ninety-Fifth Omnibus Objection as to the Claim to Be Heard.

**PLEASE TAKE FURTHER NOTICE** that, with the exception of the Claim to Be Heard, as of the Response Deadline, the Claimants associated with all other claims listed on Exhibit A

hereto failed to respond to or otherwise oppose the Two Hundred Ninety-Fifth Omnibus Objection (the “Claims to Be Partially Disallowed and Partially Reclassified via Notice of Presentment”).

**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit B** is a proposed order (the “Proposed Order”) partially disallowing and partially reclassifying (1) the Claim to Be Heard and (2) the Claims to Be Partially Disallowed and Partially Reclassified via Notice of Presentment.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Paragraph III.H of the Court’s *Sixteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 20190-1], “the presentment of a proposed order for administrative relief must be filed and served at least seven (7) calendar days before the presentment date, and Objections thereto must be filed and served at least one (1) calendar day before the presentment date,” and accordingly, unless a written objection to the Proposed Order is filed with the Court no later than **4:00 p.m. (Atlantic Time) on May 31, 2022**, the relief requested shall be deemed unopposed, and the Proposed Order may be entered without a further hearing.

**PLEASE TAKE FURTHER NOTICE** that copies of all documents filed in these Title III cases are available (a) free of charge by visiting <https://cases.ra.kroll.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court’s website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

*[Remainder of Page Intentionally Left Blank]*

Dated: May 24, 2022  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

Martin J. Bienenstock

Brian S. Rosen

(Admitted *Pro Hac Vice*)

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